

Registration Number 91459-1

PROCESSING REQUEST

Reg # 91459-1

Decision #510290

Description:

Electronic Label & Letter
(see PPLS):

OR

Non Electronic
Label & Letter
(Scanning required):

X Dated: 11/30/15

☐ Dated:

Only one label type should be selected

Other Materials Sent (see jacket):

☐ New CSF(s) Dated:

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Dominic Schuler

Division: RD/HB

Phone: 7033470260

Date: 12/1/15



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 30, 2015

Willowwood Sulfentrazone LLC
c/o James Wagner
Wagner Regulatory Associates
PO Box 640
7217 Lancaster Pike, Suite A
Hockessin, DE 19707

Subject: Label Amendment – Me-too addition of Apples
Product Name: WILLOWOOD SULFENTRAZONE TECHNICAL HERBICIDE
EPA Registration Number: 91459-1
Application Date: 10/12/15
Decision Number: 510290

Dear Mr. Wagner:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

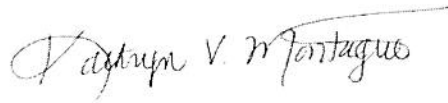
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2
EPA Reg. No. 91459-1
Decision No. 510290

with FIFRA section 6. If you have any questions, you may contact Dominic Schuler at 703-347-0260 or via email at schuler.dominic@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Kathryn V. Montague". The signature is written in dark ink and is positioned above the typed name.

Kathryn Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Willowood Sulfentrazone Technical Herbicide

Formulating Use Only

Active Ingredient:

Sulfentrazone: *N*-{2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro
-3-methyl-5-oxo-1*H*-1,2,4-triazole-1-yl]phenyl}methanesulfonamide..... 95.0%

Other Ingredients: 5.0%

Total: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Additional Precautionary Statements and Directions for Use on label.

EPA Reg. No. 91459-1

EPA Est. XXXX

Net Contents: 110 pounds (50 kg), 55 pounds (25 kg)

ACCEPTED

11/30/2015

Under the Federal Insecticide, Fungicide,
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 91459-1

FIRST AID	
If inhaled	<ul style="list-style-type: none">• Move person to fresh air• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes.• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• Call a poison control center or doctor immediately for treatment advice.• Have person sip a glass of water if able to swallow.• Do not induce vomiting unless told to do so by a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
EMERGENCY NUMBERS	
For 24 Hour Medical Emergency Assistance (Human or Animal), Call 1-800-222-1222 .	
For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300 .	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

CAUTION. Causes moderate eye irritation. Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Only for formulation into an herbicide for the following uses:

- **TERRESTRIAL - FOOD:** Apples, Asparagus, Berry Crop Group 13; Brassica head and stem subgroup 5A; Brassica leafy greens subgroup 5B; Cabbage; Citrus Crop Group 10; Dry Bean; Dry Pea; Field Corn; Flax; Horseradish; Melon subgroup 9A; Mint; Vegetable corm and tuberous subgroup 1C; Vegetable fruiting subgroup 8; Okra; Peanuts; Pea, Succulent; Pistachio; Rhubarb; Soybeans; Succulent Cowpea; Succulent Lima Bean; Sugarcane; Sunflower subgroup 20B; Tobacco; Tree Nut Crop Group 14; Turnips; Spring Wheat; Turf; and Vegetable Soybean (edamame).
- Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage:

Do not store below 25°C. Store in original container only. Product may crystallize at temperatures below 25°C (77°F). If product crystallizes, the material may be melted at room temperatures not to exceed 85°C (185°F). Keep container closed when not in use. Do not store near food or feed. Store in a dry area and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. In case of spill, avoid contact, isolate area, and keep animals and unprotected persons out of the area. To confine spills, dike surrounding area or absorb with sand, cat litter, or commercial clay. Place damaged package in a holding container and identify the contents.

Pesticide Disposal:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance. Open dumping is prohibited.

Container Handling:

NONREFILLABLE CONTAINER (Plastic): Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NONREFILLABLE CONTAINER (Bags): Do not reuse or refill this container.

Completely empty bag into application equipment. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

REFILLABLE CONTAINER: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood Sulfentrazone LLC. To the

extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD SULFENTRAZONE LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Sulfentrazone LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD SULFENTRAZONE LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD SULFENTRAZONE LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

Manufactured for:
Willowood Sulfentrazone, LLC
1600 NW Garden Valley Blvd. Suite 130
Roseburg, OR 97471



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 14, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

CARRIE NOLAN
WAGNER REGULATORY ASSOCIATES, INC.
WILLOWOOD SULFENTRAZONE, LLC
PO Box 640
HOCKESSIN, DE 19707-

PRODUCT NAME: WILLOWOOD SULFENTRAZONE TECHNICAL HERBICIDE
COMPANY NAME: WILLOWOOD SULFENTRAZONE, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 91459-1
EPA RECEIPT DATE: 10/13/15

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

A handwritten signature in black ink, appearing to be "S. J. [unclear]", is written over the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division



United States
Environmental Protection Agency
 Washington, DC 20460

<input checked="" type="checkbox"/> Registration	OPP Identifier Number
<input type="checkbox"/> Amendment	
<input type="checkbox"/> Other	

Application for Pesticide - Section I

1. Company/Product Number 91459-1	2. EPA Product Manager Kathryn Montague	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Willowood Sulfentrazone, LLC/Willowood Sulfentrazone Technical	PM# 23	
5. Name and Address of Applicant (Include Zip Code) Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. 279-3149 Product Name: Sulfentrazone Technical

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Section - III**

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Unit Packaging wgt. container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" No. per Package wgt container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) HDPE lined bags
* Certification must be submitted			
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 50 kg (110 lbs) 25 kg (55 lbs)	5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)			
Name James M. Wagner	Title Agent for Willowood Sulfentrazone, LLC	Telephone No. (Include Area Code) (302) 635 7289	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received <div style="text-align: center;">(Stamped)</div>
2. Signature 	3. Title Agent for Willowood Sulfentrazone, LLC		
4. Typed Name James M. Wagner	5. Date October 12, 2015		

October 12, 2015

Document Processing Desk (AMEND)
ATTN: Kathryn Montague, PM Team 23
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Dear Ms. Montague,

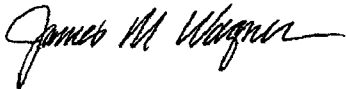
Subject: Willowood Sulfentrazone Technical, EPA Reg. No. 91459-1, amendment adding apples

Wagner Regulatory Associates, Inc., as agent for Willowood Sulfentrazone, LLC is requesting a registration amendment of the above referenced product to add apples to the list of approved crops. In support of this request, the following documents are attached:

- Letter from Willowood Sulfentrazone, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35)
- Draft labeling, 1 clean and 1 highlighted copy
- Certification with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. 279-3149

If you need to contact me regarding this submission I am available by telephone and email as indicated below. Thank you for your help with this application.

Sincerely,



James M. Wagner
Agent for Willowood Sulfentrazone, LLC
Tel: (302) 635-7290; Email: james@wagnerreg.com

Enclosures



Willowood Sulfentrazone, LLC.

1600 NW Garden Valley Boulevard, Suite 120, Roseburg, Oregon 97471
Tel: 541-679-9963 Fax: 541-679-4650 www.willowoodusa.com

December 22, 2014

To: Whom it May Concern

RE: Designation of Agent for:
Willowood Sulfentrazone, LLC
1600 NW Garden Valley Blvd Suite 120
Roseburg, Oregon 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Sulfentrazone, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Willowood Sulfentrazone, LLC will register with US EPA and the states. Please forward all correspondence for our company and its products to:

Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me if you have any questions.

Respectfully submitted,

Brian Heinze
President/CEO
Willowood USA

cc: WRA, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Willowood Sulfentrazone, LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol 91459-1
Active Ingredient(s) and/or representative test compound(s) Sulfentrazone	Date October 12, 2015
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food	Product Name Willowood Sulfentrazone Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

James M. Wagner

Date

Oct. 12, 2015

Typed or Printed Name and Title

James Wagner, Agent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: October 12, 2015	EPA Reg No./ File Symbol: 91459-1	Page 1 of 3
Applicant's/Registrant's Name and Address: Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Sulfentrazone Technical	
Ingredient: Sulfentrazone		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product identity, composition/Description of materials Used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	49059001	Tagros Chemicals India Ltd.	PER	
830.1700	Preliminary Analysis	49059002	Tagros Chemicals India Ltd.	PER	
830.1750	Certification of Limits	49059001 49059002	Tagros Chemicals India Ltd.	PER	
830.1800	Enforcement Analytical Method	49059002	Tagros Chemicals India Ltd.	PER	
830.6302	Color	49059002	Tagros Chemicals India Ltd.	PER	
830.6303	Odor	49059002	Tagros Chemicals India Ltd.	PER	
830.6304	Physical State	49059002	Tagros Chemicals India Ltd.	PER	
830.6313	Stability to Normal & Elevated Temperatures	49059002	Tagros Chemicals India Ltd.	PER	
830.6314	Oxidation/Reduction	49059002	Tagros Chemicals India Ltd.	PER	
830.6315	Flammability		Willowood Sulfentrazone, LLC	WAI	1
830.6316	Explosibility		Willowood Sulfentrazone, LLC	WAI	1
830.6317	Accelerated Storage Stability		Tagros Chemicals India Ltd.	PER	
830.6319	Miscibility		Willowood Sulfentrazone, LLC	WAI	1
830.6320	Corrosion Characteristics		Tagros Chemicals India Ltd.	PER	
830.6321	Dielectric Breakdown Voltage		Willowood Sulfentrazone, LLC	WAI	1
830.7000	pH	49059002	Tagros Chemicals India Ltd.	PER	
830.7050	UV/visible Light Absorption	49059002	Tagros Chemicals India Ltd.	PER	
830.7100	Viscosity		Willowood Sulfentrazone, LLC	WAI	1

Signature 	Name and Title James M. Wagner, Agent for Willowood Sulfentrazone, LLC	Date 10/12/2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: October 12, 2015	EPA Reg No./ File Symbol: 91459-1	Page 2 of 3
Applicant's/Registrant's Name and Address: Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Sulfentrazone Technical	
Ingredient: Sulfentrazone		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting Point	49059002	Tagros Chemicals India Ltd.	PER	
830.7220	Boiling Point		Willowood Sulfentrazone, LLC	WAI	2
830.7300	Relative Density	49059002	Tagros Chemicals India Ltd.	PER	
830.7370	Dissociation Constants in Water	49059002	Tagros Chemicals India Ltd.	PER	
830.7520	Particle Size, Fiber Length, and Diameter Distribution		Willowood Sulfentrazone, LLC	WAI	3
830.7550	Octanol/Water Partition Coefficient	49059002	Tagros Chemicals India Ltd.	PER	
830.7840	Solubility in Organic Solvents	49059002	Tagros Chemicals India Ltd.	PER	
830.7840	Water Solubility	49059002	Tagros Chemicals India Ltd.	PER	
830.7950	Vapor Pressure		Willowood Sulfentrazone, LLC	WAI	4
ACUTE TOXICITY & GENERIC DATA		Cite All	FMC Corp., Philadelphia, PA	Pay	
			E.I. Du Pont De Nemours and Company Wilmington, DE		
			PBI/Gordon Corp. Kansas City, MO		
			FIFRA Endangered Species Task Force, LLC, Washington, DC		
			Chemsico, St. Louis, MO		
			Spray Drift Task Force Washington, DC		
			Agricultural Reentry Task Force Washington, DC 20005		

Signature 	Name and Title James M. Wagner, Agent for Willowood Sulfentrazone, LLC	Date 10/12/2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX

Date: October 12, 2015	EPA Reg No./ File Symbol: 91459-1	Page 3 of 3
Applicant's/Registrant's Name and Address: Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Sulfentrazone Technical	
Ingredient: Sulfentrazone		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Tagros Chemicals India Ltd. Brookfield, CT		
			Helm Agro, West Chester, PA		
			Agricultural Handler Exposure Task Force, Macon, MO		
			Summit Agro USA LLC, Gig Harbor, WA		

Footnotes:

- 1) 830.6315, 830.6316, 830.6319, 830.6321, 830.7100: These data not required for Technical Grade Active Ingredients.
- 2) 830.7220: Willowood Sulfentrazone Technical is not liquid at room temperature; therefore, this data not required.
- 3) 830.7520: Willowood Sulfentrazone Technical is soluble in water; therefore, this data not required.
- 4) 830.7950: Willowood Sulfentrazon Technical is not a salt; therefore, this data is not required.

Signature 	Name and Title James M. Wagner, Agent for Willowood Sulfentrazone, LLC	Date 10/12/2015
--	--	--------------------

PROCESSING REQUEST

Reg #:

91459-1

Decision #:

498681

Description:

New product

Material Available Electronically (see PPLS):



Electronic Label/Letter Dated:

9-2-15



Other:

Material Sent (see jacket):



Stamped Label/Letter Dated:



Notification Dated:



New CSF(s) Dated:



Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer:

Grant Rowland

Division:

RD/HB

Phone:

Date:

9-4-15



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

91459-1

Date of Issuance:

9/2/2015

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Willowood Sulfentrazone Technical
Herbicide

Name and Address of Registrant (include ZIP Code):

Willowood Sulfentrazone, LLC
c/o Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Kathryn Montague Product Manager 23
Herbicide Branch, Registration Division (7505P)

Date:

9/2/2015

2. Make the following label changes before you release the product for shipment:

- Revise the EPA Registration Number to read, "EPA Reg. No. 91459-1."

3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

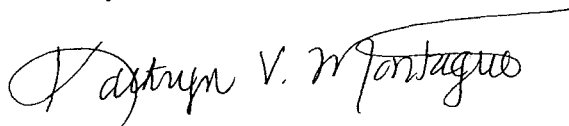
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 01/28/2015

If you have any questions, please contact Grant Rowland by phone at 703-347-0254, or via email at rowland.grant@epa.gov

Sincerely,



Kathryn V. Montague, Product Manager 23
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Willowood Sulfentrazone Technical Herbicide

Formulating Use Only

Active Ingredient:Sulfentrazone: *N*-[2,4-dichloro-5-[4-(difluoromethyl)-4,5-dihydro-3-methyl-5-oxo-1*H*-1,2,4-triazole-1-yl]phenyl]methanesulfonamide 95.0%**Other Ingredients:** 5.0%**Total:** 100.0%**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Additional Precautionary Statements and Directions for Use on label.

EPA Reg. No. XXX

EPA Est. XXXX

Net Contents: 110 pounds (50 kg), 55 pounds (25 kg)**ACCEPTED****09/02/2015**Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 91459-1

FIRST AID	
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
EMERGENCY NUMBERS	
For 24 Hour Medical Emergency Assistance (Human or Animal), Call 1-800-222-1222 .	
For Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call ChemTrec at 1-800-424-9300 .	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

CAUTION. Causes moderate eye irritation. Harmful if swallowed, absorbed through skin or inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing vapor. Remove contaminated clothing and wash before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet.

Environmental Hazards

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Formulators using this product are responsible for obtaining EPA registration for their formulated products.

Only for formulation into an herbicide for the following uses:

- **TERRESTRIAL - FOOD:** Asparagus, Berry Crop Group 13; Brassica head and stem subgroup 5A; Brassica leafy greens subgroup 5B; Cabbage; Citrus Crop Group 10; Dry Bean; Dry Pea; Field Corn; Flax; Horseradish; Melon subgroup 9A; Mint; Vegetable corm and tuberous subgroup 1C; Vegetable fruiting subgroup 8; Okra; Peanuts; Pea, Succulent; Pistachio; Rhubarb; Soybeans; Succulent Cowpea; Succulent Lima Bean; Sugarcane; Sunflower subgroup 20B; Tobacco; Tree Nut Crop Group 14; Turnips; Spring Wheat; Turf; and Vegetable Soybean (edamame).
- Uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; and
- Uses for experimental purposes that are in compliance with USEPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage:

Do not store below 25°C. Store in original container only. Product may crystallize at temperatures below 25°C (77°F). If product crystallizes, the material may be melted at room temperatures not to exceed 85°C (185°F). Keep container closed when not in use. Do not store near food or feed. Store in a dry area and avoid excess heat. Carefully open containers. After partial use, replace lids and close tightly. Do not put concentrate or dilute material into food or drink containers. In case of spill, avoid contact, isolate area, and keep animals and unprotected persons out of the area. To confine spills, dike surrounding area or absorb with sand, cat litter, or commercial clay. Place damaged package in a holding container and identify the contents.

Pesticide Disposal:

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance. Open dumping is prohibited.

Container Handling:

NONREFILLABLE CONTAINER (Plastic): Do not reuse or refill this container. Triple rinse (or equivalent). Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

NONREFILLABLE CONTAINER (Bags): Do not reuse or refill this container.

Completely empty bag into application equipment. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

REFILLABLE CONTAINER: Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

Do not refill or transport damaged or leaking container.

CONTAINER IS NOT SAFE FOR FOOD, FEED OR DRINKING WATER.

CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully.

However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Willowood Sulfentrazone LLC. To the

extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD SULFENTRAZONE LLC MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. To the extent consistent with applicable law, no agent of Willowood Sulfentrazone LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, WILLOWOOD SULFENTRAZONE LLC DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT WILLOWOOD SULFENTRAZONE LLC'S ELECTION, THE REPLACEMENT OF PRODUCT.

Manufactured for:
Willowood Sulfentrazone, LLC
1600 NW Garden Valley Blvd. Suite 130
Roseburg, OR 97471

Product ingredient source information may be entitled to confidential treatment

December 26, 2014

Document Processing Desk (REGFEE)
ATTN: Kathryn Montague, PM Team 23
Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



Dear Ms. Montague,

Subject: Application to register a new technical grade product containing a currently registered active ingredient - "Willowood Sulfentrazone Technical"

Wagner Regulatory Associates, Inc., as agent for Willowood Sulfentrazone, LLC is requesting registration of the above referenced product. An EPA company number was requested on December 22nd but has not been received so far.

Willowood's product is identical to [REDACTED]

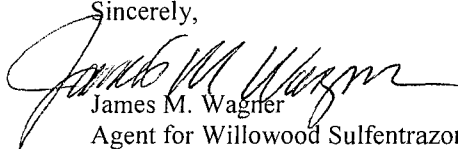
In support of this request, the following documents and studies are attached:

- Letter from Willowood Sulfentrazone, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- [REDACTED]
- Letter requesting an EPA Company Number for Willowood Sulfentrazone LLC
- Rationale and request for EPA Discretionary Refund of PRIA Fee and Reduction of PRIA Timeline
- Application for Pesticide Registration (8570-1)
- Confidential Statement of Formula (8570-4), 2 copies
- Certification with Respect to Citation of Data (8570-34)
- Data Matrix (8570-35)
- Draft labeling, 3 copies and CD
- Certification with Respect to Label Integrity
- A copy of the EPA approved label for EPA Reg. No. [REDACTED]
- A copy of the receipt confirming payment of the required registration fees.

Willowood Sulfentrazone, LLC has submitted payment to U.S.EPA in accordance with PRIA3 Fee Table – FY14/FY15, for action category R333 - \$18,893.00. At the same time, we are submitting a 'Rationale and Request for Discretionary Refund and Reduction of PRIA Timeline'.

If you need to contact me regarding this submission I am available by telephone and email as indicated below. Thank you for your help with this application.

Sincerely,



James M. Wagner
Agent for Willowood Sulfentrazone, LLC
Tel: (302) 635-7290; Email: james@wagnerreg.com

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Willowood Sulfentrazone, LLC, P.O. Box 640, Hockessin, DE 19707	EPA Registration Number/File Symbol Unassigned
Active Ingredient(s) and/or representative test compound(s) Sulfentrazone	Date December 26, 2014
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial Food	Product Name Willowood Sulfentrazone Technical

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input checked="" type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
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SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature 	Date Dec. 26, 2014	Typed or Printed Name and Title James Wagner, Agent
--	-----------------------	--



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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Date: December 26, 2014	EPA Reg No./ File Symbol: Unassigned-	Page 1 of 3
Applicant's/Registrant's Name and Address: Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates Inc. P.O. Box 640 Hockessin, DE 19707	Product: Willowood Sulfentrazone Technical	
Ingredient: Sulfentrazone		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550, 830.1600, 830.1620, 830.1650, 830.1670,	Product identity, composition/Description of materials Used to Produce the Product/Description of Formulation Process/Discussion of Formation of Impurities	49059001	Tagros Chemicals India Ltd.	PER	✓
830.1700	Preliminary Analysis	49059002	Tagros Chemicals India Ltd.	PER	✓
830.1750	Certification of Limits	49059001 49059002	Tagros Chemicals India Ltd.	PER	✓
830.1800	Enforcement Analytical Method	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6302	Color	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6303	Odor	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6304	Physical State	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6313	Stability to Normal & Elevated Temperatures	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6314	Oxidation/Reduction	49059002	Tagros Chemicals India Ltd.	PER	✓
830.6315	Flammability		Willowood Sulfentrazone, LLC	WAI	1 ✓
830.6316	Explosibility		Willowood Sulfentrazone, LLC	WAI	1 ✓
830.6317	Accelerated Storage Stability		Willowood Sulfentrazone, LLC	OWN	5 ✓
830.6319	Miscibility		Willowood Sulfentrazone, LLC	WAI	1 ✓
830.6320	Corrosion Characteristics		Willowood Sulfentrazone, LLC	OWN	5 ✓
830.6321	Dielectric Breakdown Voltage		Willowood Sulfentrazone, LLC	WAI	1
830.7000	pH	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7050	UV/Visible Light Absorption	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7100	Viscosity		Willowood Sulfentrazone, LLC	WAI	1 ✓

Signature 	Name and Title James M. Wagner, Agent for Willowood Sulfentrazone, LLC	Date 12/26/2014
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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Ingredient: Sulfentrazone		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7200	Melting Point	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7220	Boiling Point		Willowood Sulfentrazone, LLC	WAI	2 ✓
830.7300	Relative Density	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7370	Dissociation Constants in Water	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7520	Particle Size, Fiber Length, and Diameter Distribution		Willowood Sulfentrazone, LLC	WAI	3 ✓
830.7550	Octanol/Water Partition Coefficient	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7840	Solubility in Organic Solvents	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7840	Water Solubility	49059002	Tagros Chemicals India Ltd.	PER	✓
830.7950	Vapor Pressure		Willowood Sulfentrazone, LLC	WAI	4 ✓
ACUTE TOXICITY & GENERIC DATA		Cite All	FMC Corp., Philadelphia, PA	Pay	
			E.I. Du Pont De Nemours and Company Wilmington, DE		
			PBI/Gordon Corp. Kansas City, MO		
			FIFRA Endangered Species Task Force, LLC, Washington, DC		
			Chemsico, St. Louis, MO		
			Spray Drift Task Force Washington, DC		
			Agricultural Reentry Task Force Washington, DC 20005		

Signature

Name and Title

James M. Wagner,
Agent for Willowood Sulfentrazone, LLC

Date

12/26/2014



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.

WASHINGTON, D.C. 20460

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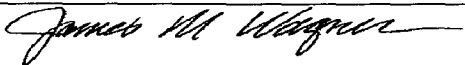
DATA MATRIX

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
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			Agricultural Handler Exposure Task Force, Macon, MO		
			Summit Agro USA LLC, Gig Harbor, WA		

Footnotes:

- 1) 830.6315, 830.6316, 830.6319, 830.6321, 830.7100: These data not required for Technical Grade Active Ingredients.
- 2) 830.7220: Willowood Sulfentrazone Technical is not liquid at room temperature; therefore, this data not required.
- 3) 830.7520: Willowood Sulfentrazone Technical is soluble in water; therefore, this data not required.
- 4) 830.7950: Willowood Sulfentrazon Technical is not a salt; therefore, this data is not required.
- 5) 830.6317 and 830.6320: Willowood agrees to conduct and submit as a condition of registration.

Signature 	Name and Title James M. Wagner, Agent for Willowood Sulfentrazone, LLC	Date 12/26/2014
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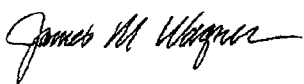
Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
XXXXX-R	December 26, 2014	XXXXXX.XX.20141226.V1.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

12/26/2014

Date

James M. Wagner

Name (typed)

Agent for Willowood Sulfentrazone, LLC

Title

Cheryl Wagner

From: pay.gov.clev@clev.frb.org
Sent: Friday, December 26, 2014 1:42 PM
To: Cheryl Wagner
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or by email at yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25J1NDUG
Agency Tracking ID: 74727550240
Transaction Type: Sale
Transaction Date: 12/26/2014 01:42:21 PM EST

Account Holder Name: Brian Heinze

Transaction Amount: \$18,893.00
Billing Address: 1600 NW Garden Valley Blvd.
Billing Address 2:
City: Roseburg
State/Province: OR
Zip/Postal Code: 97471
Country: USA
Card Type: MasterCard
Card Number: *****3276

Registration Number:
Company Name: Willowood Sulfentrazone
Company Number:
Action Code: R333

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.



Receipt

Your payment is complete

Pay.gov Tracking ID: 25J1NDUG

Agency Tracking ID: 74727550240

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$18893.00

Transaction Date: 12/26/2014 01:42:21 PM EST

Payment Date: 12/26/2014

Registration Number:

Company Name: Willowood Sulfentrazone

Company Number:

Action Code: R333

Account Information

Card Holder Name: Brian Heinze

Billing Address: 1600 NW Garden Valley Blvd.

Billing Address 2:

City: Roseburg

Country: United States

State/Province: OR

ZIP/Postal Code: 97471

Card Type: Master Card

Card Number: *****3276

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

james@wagnerreg.com

cheryl@wagnerreg.com

December 26, 2014

Registration Division
U.S. Environmental Protection Agency
Office of Pesticide Programs (7504P)
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501



To Whom It May Concern:

Re: Request for Discretionary Refund of PRIA Fee and Reduction of PRIA Timeline

Company: Willowood Sulfentrazone, LLC
Company number: unassigned at date of this letter
Product: Willowood Sulfentrazone Technical

Background: Willowood Sulfentrazone Technical is identical to the registered product [REDACTED]. Willowood's and [REDACTED] sulfentrazone products are sourced from the same [REDACTED].

Rationale for Discretionary Refund and Reduction of Timeline: Normally, based on the above background, a registration application for Willowood Sulfentrazone Technical would qualify for *PRIA Category R300 – New product; identical to a registered product; registered source of active ingredient; data authorization letter from data owner.*

However, in this instance, [REDACTED]

Therefore, Willowood has paid the PRIA fee for R333 - \$18,893, with timeline of 10 months. I hope the Agency will agree that this fee and timeline is excessive given that:

- (1) Willowood's technical product is identical in all respects to the [REDACTED];
- (2) Willowood is citing all of the data which supports the [REDACTED];
- (3) The data supporting [REDACTED] has already been reviewed and accepted by the Agency – no additional data review is required.

Request: In view of these factors, I am requesting that the Agency grant a discretionary refund of \$17,387 (difference between R333 and R300) and a timeline reduction from 10 months (R333) to 4 months (R300).

If you need to contact me regarding this request I am available by telephone and email as indicated below. Thank you for your help with this request.

Sincerely,

James M. Wagner
Agent for Willowood Sulfentrazone, LLC
Tel: (302) 635-7290; Email: james@wagnerreg.com



Willowood Sulfentrazone, LLC.

1600 NW Garden Valley Boulevard, Suite 120, Roseburg, Oregon 97471

Tel: 541-679-9963 Fax: 541-679-4650 www.willowoodusa.com

December 22, 2014

To: Whom it May Concern

RE: Designation of Agent for:
Willowood Sulfentrazone, LLC
1600 NW Garden Valley Blvd Suite 120
Roseburg, Oregon 97471

Dear Sir or Madam:

This letter serves as notification that Willowood Sulfentrazone, LLC has appointed Wagner Regulatory Associates, Inc. (WRA, Inc.) to serve as the Agent on our company's behalf regarding all state and federal regulatory matters relative to products that Willowood Sulfentrazone, LLC will register with US EPA and the states. Please forward all correspondence for our company and its products to:

Wagner Regulatory Associates, Inc.
P.O. Box 640
Hockessin, DE 19707-0640

Thank you for your time and assistance. Please feel free to call me if you have any questions.

Respectfully submitted,

Brian Heinze
President/CEO
Willowood USA

cc: WRA, Inc.



United States
Environmental Protection Agency
 Washington, DC 20460

X


Registration

OPP Identifier Number

Amendment

Other

Application for Pesticide - Section I

1. Company/Product Number Unassigned 91759	2. EPA Product Manager Kathryn Montague	3. Proposed Classification
4. Company/Product (Name) Willowood Sulfentrazone, LLC/Willowood Sulfentrazone Technical	PM# 23	<input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
5. Name and Address of Applicant (Include Zip Code) Willowood Sulfentrazone, LLC c/o Wagner Regulatory Associates, Inc. P.O. Box 640 Hockessin, DE 19707 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: 	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Section - III**

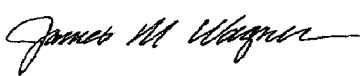
1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
	If "Yes" No. per Unit Packaging wgt. container	If "Yes" No. per Package wgt. container		<input checked="" type="checkbox"/> Plastic	
* Certification must be submitted				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) HDPE lined bags	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 50 kg (110 lbs) 25 kg (55 lbs)		5. Location of Label Directions <input type="checkbox"/> On Label <input checked="" type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithograph <input type="checkbox"/> Other _____ <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV**1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)**

Name James M. Wagner	Title Agent for Willowood Sulfentrazone, LLC	Telephone No. (Include Area Code) (302) 635 7289
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Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature 	3. Title Agent for Willowood Sulfentrazone, LLC
4. Typed Name James M. Wagner	5. Date December 26, 2014

6. Date Application Received

(Stamped)

